

# **EXHIBIT P**

**In re: MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al., No. 09-50026**

**Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition  
Testimony of Matthew J. Williams and the GUC Trust and New GM's Objections Thereto**

<b>Matthew J. Williams November 13 and 20, 2017</b>		
<b>Plaintiffs and Participating Unitholders' Affirmative Designations</b>		<b>GUC Trust and New GM's Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
12:7	12:17	Vague and ambiguous; Compound (FRE 611(a)); Lack of foundation (FRE 602) (12:13-17).
12:21	13:10	
16:3	16:7	
19:21	20:3	
29:14	29:25	
30:6	30:20	
56:2	57:3	
59:6	59:10	Vague and ambiguous; Compound (FRE 611(a)); Lack of foundation (FRE 602).
59:14	59:17	Designation of answer at 59:14-17 is incomplete.
59:20	60:15	
63:2	63:16	
64:4	64:11	Lack of foundation and personal knowledge (FRE 602) (64:4-10).
64:16	64:24	
65:18	65:23	
66:1	66:11	
66:24	67:8	Lack of foundation and personal knowledge (FRE 602); Mischaracterizes testimony.
67:13	68:1	
68:18	69:5	
69:16	69:19	
69:23	70:7	Lack of foundation (FRE 602); Mischaracterizes testimony (70:5-7).
70:10	70:15	
80:2	80:5	Lack of foundation (FRE 602); Mischaracterizes testimony.

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
80:10	80:17	
85:18	86:9	
90:8	91:8	
93:18	94:2	
99:6	99:13	
99:15	99:16	
101:1	101:8	
103:13	103:24	
104:18	105:2	
130:15	130:24	
136:10	137:7	
144:24	145:3	Asked & Answered (FRE 403)
145:7	145:9	Asked & Answered (FRE 403)
147:11	147:18	Compound
148:5	148:6	Improper Characterization
148:9	148:14	
148:22	149:4	Lack of foundation (FRE 602); Mischaracterizes testimony; Compound (FRE 611(a)).
149:14	149:17	
150:24	151:3	
151:8	152:5	
152:9	152:17	
163:6	163:12	Compound
164:8	164:19	
184:19	185:5	
188:11	188:13	Asked & Answered (FRE 403)
227:23	228:4	Relevance.
228:14	228:16	Relevance.
230:25	231:12	Relevance.
232:2	232:3	Relevance; Lack of foundation (FRE 602)
232:5	232:6	Relevance.
243:24	244:1	Not Testimony

**GUC Trust and New GM's Counter Designations of the Deposition Testimony of Matthew J. Williams and the Plaintiffs and Participating Unitholders' Objections Thereto**

<b>Matthew J. Williams November 13 and 20, 2017</b>		
<b>GUC Trust and New GM's Counter Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections to Counter Designations</b>
<b>Counter-Designation Begin</b>	<b>Counter-Designation End</b>	
16:9	16:14	This designation (counter or not) is incomplete in and of itself (106); even if it were "complete" by itself, this is not a proper valid counter-designation to any of the content affirmatively designated (FRE 106); hearsay (FRE 801, 802); lacks foundation/ personal knowledge (FRE 601, 602)
16:17	16:18	Incomplete (FRE106); does not "complete" anything that in fairness should be introduced contemporaneously with the affirmative designations (FRE106); lacks foundation/personal knowledge
28:23	29:13	Impermissible hearsay (FRE 802)
30:1	30:5	Lack of foundation, calls for speculation (FRE 602)
46:16	46:22	Not a valid counter-designation, as fairness/completeness does not require that this be considered contemporaneously with any of the affirmative designations (FRE 106); Lack of foundation, calls for speculation (FRE 602)
59:11	59:13	Improper record objection (FRE 401-403)
60:1	60:13	Impermissible hearsay (FRE 802)
63:17	63:20	Lacks foundation/personal knowledge (FRE 601, 602); improper counter-designation (completeness / fairness does not require inclusion of this designation with the affirmatively designated content) (FRE 106)).
64:1	64:3	Lacks foundation/personal knowledge (FRE 601, 602);

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<b>Counter-Designation Begin</b>	<b>Counter-Designation End</b>	
		improper counter-designation (completeness / fairness does not require inclusion of this designation with the affirmatively designated content) (FRE 106)).
67:9	67:10	Improper record objection (FRE 401-403)
79:21	79:24	
84:3	84:6	This is not a valid counter-designation and furthermore is incomplete and out of context by itself (FRE 106); Relevance (FRE 401-403); lacks foundation (FRE 601, 602).
94:3	94:6	Not a valid counter-designation and completeness/fairness does not require its inclusion contemporaneously with the affirmatively designated testimony (106); hearsay (FRE 801, 802).
94:7	94:9	Not a valid counter-designation and completeness/fairness does not require its inclusion contemporaneously with the affirmatively designated testimony(106); hearsay (FRE 801, 802).
94:21	95:3	
95:6	96:15	
97:15	98:1	Not a valid counter-designation to the affirmatively designated content (FRE 106); Lack of foundation, calls for expert opinion (FRE 602, 701, 702); calls for speculation (FRE 602)
98:21	99:5	Impermissible hearsay (FRE 802)
99:14	99:14	
99:17	100:11	Relevance (FRE 401); Lack of foundation, calls for expert opinion (FRE 602, 701, 702); Calls for speculation (FRE 602); incomplete

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<b>Counter-Designation Begin</b>	<b>Counter-Designation End</b>	
		(FRE 106); not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106).
100:20	100:25	Relevance (FRE 401); Lack of foundation, calls for expert opinion (FRE 602, 701, 702); Calls for speculation (FRE 602); incomplete (FRE 106); not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106).
101:12	101:17	Relevance (FRE 401); Lack of foundation, calls for expert opinion (FRE 602, 701, 702); Calls for speculation (FRE 602); incomplete (FRE 106); not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106).
126:20	127:3	Not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106); impermissible hearsay (FRE 802); relevance (FRE 401).
127:4	128:7	Not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106); impermissible hearsay (FRE 802); relevance (FRE 401).
128:10	128:14	Not a valid counter-designation, as

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<b>Counter-Designation Begin</b>	<b>Counter-Designation End</b>	
		neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106); impermissible hearsay (FRE 802); relevance (FRE 401-403)
128:15	129:2	Not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106); impermissible hearsay (FRE 802); Relevance (FRE 401); Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
130:5	130:14	Incomplete/ not a valid counter- designation under FRE 106; Lack of foundation, calls for expert testimony (FRE 602, 701, 702)
134:21	135:5	Hearsay (FRE 801, 802); lack of foundation/ personal knowledge (FRE 601, 602); incomplete (FRE 106); not a proper counter- designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
135:7	135:18	Hearsay (FRE 801, 802); lack of foundation/ personal knowledge (FRE 601, 602); incomplete (FRE 106); not a proper counter- designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
136:5	136:9	Lacks foundation/ personal knowledge (FRE 601, 602)
138:20	139:1	Incomplete in and of itself (FRE 106); not a proper counter-

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<b>Counter-Designation Begin</b>	<b>Counter-Designation End</b>	
		designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); calls for speculation (FRE 602)
142:4	143:8	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
145:10	145:24	Incomplete and out-of-context in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106);
146:9	147:7	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
147:21	148:4	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
149:5	149:10	Improper record objection (FRE 401-403); not a valid counter-designation because neither completeness nor fairness requires this be considered contemporaneously with the



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<b>Counter-Designation Begin</b>	<b>Counter-Designation End</b>	
		affirmative designations (FRE 106)
153:24	154:5	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
154:8	155:2	Improper counter-designation (FRE106) (does not complete any content affirmatively designated by); Lack of foundation (FRE 602)
155:15	155:25	Lack of foundation, speculation (FRE 602); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
156:15	157:25	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
158:1	159:24	Relevance (FRE 401-403); hearsay (801, 802)
162:7	163:2	This is not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); moreover, on its own, this excerpt is out of context and incomplete (FRE 106)
164:20	164:25	This is not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE

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<b>Counter-Designation Begin</b>	<b>Counter-Designation End</b>	
		106); moreover, on its own, this excerpt is out of context and incomplete (FRE 106); hearsay (FRE 801, 802).
166:3	166:25	This is not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); moreover, on its own, this excerpt is out of context and incomplete (FRE 106); hearsay (FRE 801, 802).
167:7	167:9	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
186:2	187:13	Calls for hearsay (FRE 802); incomplete (answer designated without the preceding question) (FRE 106); not a proper counter-designation because neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); speculative/lacks foundation (FRE 601, 602).
187:21	188:6	Calls for speculation (FRE 602); incomplete (answer designated without the preceding question) (FRE 106); not a proper counter-designation because neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
191:13	192:3	Incomplete (FRE 106); not a proper

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<b>Counter-Designation Begin</b>	<b>Counter-Designation End</b>	
		counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); improper record objection (FRE 401-403).
192:20	193:5	Incomplete (answer designated without the preceding question) (FRE 106); not a proper counter-designation because neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); speculation; more prejudicial than probative (FRE 401-403).
193:9	193:10	Not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); incomplete in and of itself (FRE 106).
193:15	193:20	Not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); incomplete in and of itself (FRE 106); speculation / lack of foundation (FRE 601, 602).
198:14	199:14	Calls for hearsay (FRE 802)
200:1	201:9	Calls for hearsay (FRE 802); Objection to form vague and ambiguous (FRE 611(a)); Objection to the form confusing (FRE 611(a)); Objection to the form compound (FRE 611(a))
201:18	202:4	Calls for hearsay (FRE 802)
228:17	229:3	

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Counter-Designation Begin	Counter-Designation End	
239:24	240:19	Calls for hearsay (FRE 802); Calls for speculation (FRE 602)
242:23	243:23	Calls for hearsay (FRE 802); Lack of personal knowledge (FRE 602); Calls for speculation (FRE 602); Objection to form, asked and answered (FRE 611(a))
244:2	244:3	